Bauer, Candice

From: Blasing, Nicole (MPCA) <nicole.blasing@state.mn.us>

Sent: Monday, February 27, 2017 8:04 AM

To: Ireland, Scott

Subject: RE: Grove City Permit #MN0023574

Thank you.

Nicole Blasing, Supervisor North Central Regional Unit Municipal Wastewater Section Ph. 218-316-3890

Our mission is to protect and improve the environment and enhance human health.

From: Ireland, Scott [mailto:ireland.scott@epa.gov]

Sent: Friday, February 24, 2017 4:34 PM

To: Turri, Wendy (MPCA); Blasing, Nicole (MPCA)

Cc: Pierard, Kevin; Bauer, Candice

Subject: Re: Grove City Permit #MN0023574

Wendy and Nicole,

We appreciate you reaching out on the changes proposed to the Grove City Permit and for the phone call on February 21, 2017 to further explain the modifications.

Based on the explanation below as well as the responses to the questions Candice Bauer and I had on the February 21 call, EPA has no objections to this permit going out for public comment and unless changes are made to this permit prior to issuance that would change the conditions outlined below, EPA would have no additional objections or additional recommendations and the permit may be issued in accordance with the Memorandum of Agreement and pursuant to the Clean Water Act.

Sincerely, Scott Ireland

D. Scott Ireland
Chief, Section 1
NPDES Programs Branch
77 West Jackson Blvd., MC: WN-15J
Chicago, IL 60604
(312) 886-8121
Ireland.Scott@epa.gov

From: Turri, Wendy (MPCA) [mailto:wendy.turri@state.mn.us]

Sent: Friday, February 17, 2017 3:30 PM
To: Pierard, Kevin pierard.kevin@epa.gov
Subject: Grove City Permit #MN0023574

Hi Kevin,

Are you enjoying this nice weather. It is 60 degrees in Minnesota right now!

I am looking forward to our meeting on March 15. I do really appreciate you coming to Minnesota to meet in person as I feel that is the most productive way to work through your questions related to our implementation procedures for the River Eutrophication Standards. Prior to that meeting Nicole and I would like to have a phone meeting with you and Scott to discuss the draft NPDES permit for Grove City. I have outlined what we would like to discuss below:

On October 26, 2016 we sent you a draft NPDES permit for the Grove City WWTP for review and Scott responded by email that EPA would be completing a focused phosphorus review on the permit. Since that time we have made changes to the permit such that it will no longer need a focused phosphorus review. I have outlined these changes below:

<u>Draft NPDES Permit for the Grove City WWTP</u> – as sent to you on October 26, 2016

The draft permit that was sent to you on October 26, 2016 includes a voluntary construction schedule for the permittee to build a stabilization pond system. The new stabilization pond system will be built with sufficient storage capacity such that it will not discharge during the months of June – September, when compliance with a RES limit is required. Since this was a voluntary construction schedule the permit also included a requirement that states that if the Permittee didn't complete the proposed construction project that they would have to comply with a RES limit during June – September.

Updated draft NPDES Permit for the Grove City WWTP - ready for public notice

The Permittee has the funding set and is ready to move forward with their construction project this spring. They would like to go out for bids by the end of February. As a result the City has accepted a final compliance date for completion of their construction project. As a result, the permit has been modified to include a compliance related construction schedule. After completion of construction the permit includes a restricted discharge window and authorizes the stabilization pond system to discharge only during the months of March 1 – May 31 and October 1 – December 31. Therefore the revised permit includes a compliance related construction schedule to attain compliance with a discharge of no phosphorous during the months of June – September.

We believe that the updated draft NPDES Permit for the Grove City WWTP no longer fulfills EPA's focused phosphorous review criteria since the permittee is constructing to comply with a 0 phosphorus limit during June – September and a final compliance date is required in the permit.

Prior to placing the permit on public notice we would like a response from EPA indicating that this permit, with the changes outlined above, would no longer require a focused phosphorus review.

If possible we would like to meet with you Tuesday, Feb. 22 of next week as we need to move the permit forward as quickly as possible so that the Permittee can proceed with construction. I have included a few times that work for us below:

Tuesday, Feb 22, 9-10am, 11:30 am – 12:30 pm, or 2:30 – 3:30 pm

Thank you, Wendy